

UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

REGATTA RIVERVIEW, LLC

Plaintiff

v.

CAMERON WINKLEVOSS, SEATTLE
SOFTWARE SYSTEMS, INC., and
WINSTON WILLIAMS.

Defendants.

CIVIL ACTION NO. 05-11476 DPW

JOINT MOTION TO SEAL ALL PLEADINGS AND THIS MOTION ITSELF

Plaintiff Regatta Riverview, LLC (“Plaintiff”) and defendants Cameron Winklevoss, Seattle Software Systems, Inc., and Winston Williams (“Defendants”) jointly move to seal permanently all pleadings in this case and to seal this motion itself. In support of this motion, the parties state the following:

1. The parties have settled this case, resolving all disputes between them. A stipulation of dismissal will be filed shortly.
2. Defendants desire to seal the pleadings to avoid the public disclosure of potentially embarrassing information.
3. Given the settlement between the parties, Plaintiff desires to seal the pleadings to avoid further publication of the allegedly defamatory content of the website posted by Defendants, which has already been taken down as part of the settlement.

WHEREFORE, the parties respectfully and jointly request that all pleadings in this case, including this motion itself, be permanently sealed. The parties are available to retrieve the pleadings from the court.

REQUEST FOR ORAL ARGUMENT

The parties are available for a hearing on this motion if appropriate and at the Court's convenience.

Respectfully submitted,
REGATTA RIVERVIEW, LLC
By its attorneys,

Respectfully submitted,
CAMERON WINKLEVOSS,
SEATTLE SOFTWARE SYSTEMS,
INC. and WINSTON WILLIAMS
By their attorneys,

/s/ Bruce E. Falby
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Dated: July 14, 2005